

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

**DECLARATION OF BRIAN D. GLUECKSTEIN IN SUPPORT OF MOTION OF
DEBTORS FOR ENTRY OF AN ORDER QUASHING NOTICES OF DEPOSITION
AND FOR A PROTECTIVE ORDER BARRING REQUESTED DISCOVERY
PROPOUNDED BY DANIEL FRIEDBERG**

I, Brian D. Glueckstein, hereby declare under penalty of perjury:

1. I am a member in good standing of the Bar of the State of New York and have been admitted *pro hac vice* to practice before this Court. I am a partner of Sullivan & Cromwell LLP and am one of the attorneys representing FTX Trading Ltd. and the other Debtors and Debtors-in-Possession in the above-captioned proceedings. I submit this declaration in support of the *Motion of Debtors for Entry of an Order Quashing Notices of Deposition and for a Protective Order Barring Requested Discovery Propounded by Daniel Friedberg* (“Motion”), filed concurrently herewith, to place before the Court certain documents referenced in the Motion.²

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

² Defined terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion.

2. Attached hereto as Exhibit A is a true and correct copy of *Daniel Friedberg's Amended First Set of Requests for Production of Documents and Things to FTX Trading Ltd. and Its Affiliated Debtors and Debtors in Possession*, dated May 9, 2024.

3. Attached hereto as Exhibit B is a true and correct copy of *Daniel Friedberg's Notice of Deposition of John Ray III*, dated April 21, 2024.

4. Attached hereto as Exhibit C is a true and correct copy of *Daniel Friedberg's Notice of Deposition of Maria Cilia*, dated April 21, 2024.

5. Attached hereto as Exhibit D is a true and correct copy of *Daniel Friedberg's Notice of Deposition of Artulo Giovanoli*, dated April 21, 2024.

6. Attached hereto as Exhibit E is a true and correct copy of *Daniel Friedberg's Notice of Deposition of Roland Griesse*, dated April 21, 2024.

7. Attached hereto as Exhibit F is a true and correct copy of *Daniel Friedberg's Notice of Deposition of Kevin Cofsky*, dated April 21, 2024.

8. Attached hereto as Exhibit G is a true and correct copy of *Daniel Friedberg's Notice of Deposition of Juerg Bavaud*, dated April 21, 2024.

9. Attached hereto as Exhibit H is a true and correct copy of *Daniel Friedberg's Notice of Deposition of the Debtors Under FRCP 30(b)(6) and FRBP 9014*, dated April 21, 2024.

10. Attached hereto as Exhibit I is a true and correct copy of *Daniel Friedberg's Amended First Set of Interrogatories to FTX Trading Ltd. and Its Affiliated Debtors and Debtors in Possession*, dated May 9, 2024.

11. Attached hereto as Exhibit J is a true and correct copy of an order of the District Court of Hofe (the “Swiss Court Order”) [Proceeding No. ZES 2023 218] approving the transactions at issue in the Restructuring Motion, dated April 19, 2024.

12. Attached hereto as Exhibit K is a true and correct copy of a certified translation of the Swiss Court Order, dated May 7, 2024.

13. Attached hereto as Exhibit L is a true and correct copy of an email dated May 6, 2024, from Brian Glueckstein to Rafael Zahralddin.

14. Attached hereto as Exhibit M is a true and correct copy of an email dated May 1, 2024, from Minyao Wang to Brian Glueckstein.

15. Attached hereto as Exhibit N is a true and correct copy of an email dated May 7, 2024, from Brian Glueckstein to Rafael Zahralddin.

16. Attached hereto as Exhibit O is a true and correct copy of an email dated May 7, 2024, from Minyao Wang to Brian Glueckstein and Rafael Zahralddin.

17. Attached hereto as Exhibit P is a true and correct copy of an email dated May 9, 2024, from Minyao Wang to Brian Glueckstein and Rafael Zahralddin.

Dated: May 15, 2024

/s/ Brian D. Glueckstein

Brian D. Glueckstein